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| 1 | TREVOR J. HATFIELD, ESQ. | | |
| | Nevada Bar No. 7373 | | |
| 2 | HATFIELD & ASSOCIATES, LTD. 703 South Eighth Street | | |
| 3 | Las Vegas, Nevada 89101 (702) 388-4469 Tel. | | |
| 4 | (702) 386-9825 Fax | | |
| 5 | thatfield@hatfieldlawassociates.com | | |
| 6 | Attorney for Plaintiff | | |
| 7 | UNITED STATES DISTRICT COURT | | |
| 8 | DISTRICT OF NEVADA | | |
| 9 | | | |
| 10 | KIM BIRON, an individual, | CASE NO: 2:19-cv-01695-RFB-EJY | |
| 11 | Plaintiff, | | |
| 12 | VS. | STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO | |
| 13 | WYNDHAM VACATIONS OWNERSHIP, INC., doing business as a foreign corporation, | RESPOND TO DEFENDANT'S MOTION FOR SANCTIONS | |
| 14 15 | Defendants. | (First Request) | |
| 16 | COMES NOW, Plaintiff, KIM BIRON, ("Plaintiff"), by and through her counsel, the law | | |
| 17 | firm of Hatfield & Associates, Ltd., and Defendant WYNDHAMVACATIONS OWNERSHIP | | |
| 18 | INC. ("Defendant") by and through its counsel, Amy L. Thompson, Esq., of the law firm of Little | | |
| 19 | Mendelson, P.C., hereby stipulate and agree to extend the time for Plaintiff to Respond to | | |
| 20 | Defendant's Motion for Sanctions (ECF #47). This request is submitted pursuant to LR IA 6-1, 6-2 | | |
| 21 22 | and LR II 7-1 and 26-4 and is the party's first request for an extension of time for Plaintiff to | | |
| 23 | respond to Defendant's Motion for Sanctions. | | |
| 24 | Good cause exists for this extension, Plainting | ff's counsel's paralegal has been out of the | |
| 25 | office on leave due to needing to care for a family member, which has caused a backflow of work | | |
| 26 | Additionally, Plaintiff's counsel will need to confer with his client regarding the facts of the | | |
| 27 | attendant motion and his client has not been available | to do so. | |
| 28 | | | |

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| 1 | Accordingly, Plaintiff shall have up | to and including May 10, 2021, to respond to | |
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| 2 | Defendant's Motion for Sanctions (ECF #47). Defendant's reply to Plaintiff's response will be | | |
| 3 | extended to May 21, 2021. | | |
| 4 | Dated this 21 st day of April, 2021 | Dated this 21 st day of April, 2021 | |
| 5 | HATFIELD & ASSOCIATES | LITTLER MENDELSON, P.C. | |
| 6 | /s/ Trevor J. Hatfield | /s/ Amy L. Thompson | |
| 7 8 | By: Trevor J. Hatfield, Esq. (SBN 7373) | By: Patrick H. Hicks, Esq. (SBN 4632) | |
| 9 | 703 S. Eighth Street Las Vegas, Nevada 89101 Tel: (702) 388-4469 | Amy L. Thompson, Esq. (SBN 11907) 3960 Howard Hughes Parkway, Suite 300 | |
| 10 | Email: thatfield@hatfieldlawassociates.com Attorney for Plaintiff | Las Vegas, Nevada 89169-5937 Tel.: (702) 862-8800 | |
| 11 | Thiorney for Truming | Email: phicks@littler.com Email: athompson@littler.com | |
| 12 | | Attorneys for Defendant | |
| 13 | | | |
| 14 | IT IS SO ORDERED: | | |
| 15 | U | NITED STATES MAGISTRATE JUDGE | |
| 16 | | | |
| 17 | Da | ated: April 22, 2021 | |
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